

REMARKS

Applicants respectfully request consideration of the subject application as amended herein. In this Amendment, claims 72-91 have been amended. No new claims have been added. No new matter has been added. No claims have been canceled. Therefore, claims 71-91 are presented for examination.

Huang fails to teach or suggest all of the limitations of claims 71 and 78. Huang discusses how object rendering tasks are distributed between collaborative proxy servers. However, Huang fails to teach or suggest how object rendering is performed. For example, Huang states that an object renderer may convert a color image into a black and white image, but fails to teach how such a conversion is performed. (Huang, col. 6, lines 59-63). Huang also fails to teach generating a bitmap in a color scheme that was used to generate a photographic image, converting the bitmap to a standard intermediate format, or mapping the standard intermediate format to a selected image format. In contrast, claims 71 and 78 recite, “if the version of the digital photographic image having the selected image format is not stored at the server, generating said version of the digital photographic image by decompressing the digital photographic image to generate a bitmap in a color scheme that was used to generate the digital photographic image, converting the bitmap of the digital photographic image to a standard intermediate format, and mapping the standard intermediate format of the digital photographic image to the selected image format.”

Huang teaches determining capabilities of a client device and using the capabilities for object rendering. However, Huang fails to teach or suggest selecting an image format based on available communication bandwidth. In contrast, claim 71 recites, “selecting an image format appropriate to the capabilities of the client and the available communication bandwidth,” and

claim 78 recites, “selecting an image format based on at least one of the capabilities of the client and the available communication bandwidth.”

None of Stewart, Knight or O’Neal teach or suggest the features of claims 71 and 78 that are missing from Huang. None of these references address how object rendering is performed, nor utilizing bandwidth-based analysis for determining which format to use. Accordingly, the combination of Huang, Stewart, Knight and O’Neal fail to teach or suggest all of the limitations of claims 71, 78, or their corresponding dependent claims. Applicants respectfully submit that claims 71 and 78, and their corresponding dependent claims, are patentable over the cited references.

Claim 85 includes the language, “a photo translator to generate said version of the digital photographic image by decompressing the digital photographic image to generate a bitmap in a color scheme that was used to generate the digital photographic image, to convert the bitmap of the digital photographic image to a standard intermediate format, and to map the standard intermediate format of the digital photographic image to the selected image format if the version of the digital photographic image having the selected image format is not stored at the server,” and “the photo server to select an image format appropriate to the capabilities of the client and the available communication bandwidth.” As noted above, none of Huang, Stewart, Knight or O’Neal, alone or in combination, teach or suggest such limitations. Accordingly, the applicants respectfully assert that the present invention as claimed in claim 85, and its corresponding dependent claims, is patentable over the cited references.

Conclusion

Accordingly, applicants respectfully request the withdrawal of the rejections and submit that pending claims 71-91 are in condition for allowance. Applicants respectfully request reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Benjamin Kimes at (408) 720-8300.

Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 022666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: August 12, 2008

/Benjamin A. Kimes/

Benjamin A. Kimes

Reg. No. 50,870

1279 Oakmead Parkway
Sunnyvale, CA 94085-4040
(408) 720-8300

Customer No. 008791